

United States CONSUMER PRODUCT SAFETY COMMISSION Washington, D.C. 20207

MEMORANDUM

DATE: M

IAR 4 2003

TO

The Commission

Todd A. Stevenson, Secretary

Through:

W. H. DuRoss, III, General Counsel

Patricia Semple, Executive Director

FROM

Jacqueline Elder, Acting Assistant Executive Director,

Office of Hazard Identification and Reduction

Celestine T. Kiss, Project Manager,

Division of Human Factors,

Directorate for Engineering Sciences

SUBJECT:

Staff Response to a Question from Commissioner

Moore on Petition for Rule Requiring Product

Registration Cards (CP 01-1)

During the February 21, 2003 staff briefing on Petition CP 01-1, Commissioner Moore asked about a product registration regulation issued by the National Highway Traffic Safety Administration for tires.

The regulation in question is 49 CFR Part 574, Tire Identification and Recordkeeping. It was established to facilitate notification to purchasers of defective or nonconforming tires, so that they can take appropriate actions in the interest of safety. It requires tire dealers and distributors to supply to the purchaser a registration form already filled out with:

(1) The entire identification number of the tire(s) sold or leased to the tire purchaser;

(2) The distributor's or dealer's name and address or other means of identification known to the tire manufacturer.

It is then the purchaser's responsibility to fill in his/her name and address and mail the card. The regulation does not specifically state that the card must be postage paid by the manufacturer, dealer or distributor.

The original regulation required the dealer or distributor to fill in all the information, including the purchaser's information and return the card. However, in order to reduce the

NOTE: This document has not been reviewed or accepted by the Commission.

Initial Date 3/4/03

CPSA 5 (bitil Cleared 3/4/03)

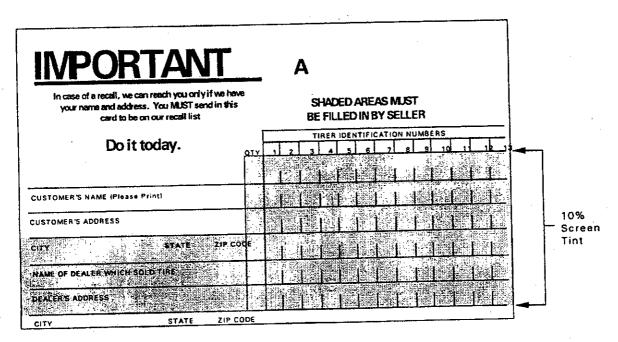
No Mfrs/PrvtLblrs or

Products Identified

Excepted by

regulatory burden on independent tire dealers, in 1982 Congress eliminated the requirement that dealers themselves register newly purchased tires with manufacturers. Instead, the purchaser may voluntarily mail in a registration card supplied by the dealer.

Below is a copy of the card required for this regulation.



1- Preprinted tire manufacturer's name - unless the manufacturer's name appears on the reverse side of the form

Figure 3a - Registration form for independent distributors and dealers - tire identification number side